

EXHIBIT D

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3

4 -----x

5 DONNA WOOD, et al, individually
6 and on behalf of all others
7 similarly situated,
8 Plaintiffs,

9 vs. 20 Civ. 2489 (LTS) (GWG)

10 MIKE BLOOMBERG 2020, INC.,
11 Defendant.
12 -----x

13
14 VIDEOTAPE DEPOSITION OF
15 ALEXANDRA WHEATLEY-DIAZ
16 VIA ZOOM VIDEOCONFERENCE

17 November 11, 2022

18 7:16 a.m. PST
19
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22
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24 Reported by:

25 Maureen Ratto, RPR, CCR

1 ALEXANDRA WHEATLEY-DIAZ

2 Q. Okay. And it's your testimony
3 here today that you never, during the
4 entire time you worked for the Campaign,
5 you worked every single Saturday and
6 Sunday?

7 A. To the best of my knowledge,
8 that is true, that I remember, and that I
9 recall. I do not recall ever not working
10 those weekends and I'm also uncertain of
11 when we stopped working in March. So
12 depending on when the last day was in
13 March and when the first day was that I
14 started working in January, and to the
15 best of my knowledge, I recall working
16 all those weekends.

17 Q. In the month of February how
18 many hours a week did you work for the
19 Campaign?

20 A. It was the same that I worked
21 in January. I'd have to get a calculator
22 to calculate the amount of time but, like
23 I said, if we were on the latter side,
24 between 12 every day, you know, 10 --
25 generally between 12, leaving the office

1 ALEXANDRA WHEATLEY-DIAZ

2 at 8 or 9 or 10, depending on the day,
3 and depending the responsibilities on
4 hand Monday through Friday and on
5 weekends, arriving at the office early,
6 early -- generally early mornings until
7 the end of the day or depending on the
8 activities that we were doing that day.
9 So it all fluctuated --

10 Q. And how many hours -- and how
11 did the activities that you were doing
12 impact your hours?

13 MS. COLE-CHU: I don't believe
14 the witness is done with her answer
15 to the last question.

16 A. Yeah. It fluctuated is my
17 statement, was my last statement.

18 Q. How did the activities impact
19 your hours?

20 A. If we were asked to go to a
21 flea market that began at 7 a.m., then we
22 were asked to show up at the flea market
23 when it began. If we were -- so it just
24 depended on what we were asked to do that
25 day.